UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

H.M. & I.B.,

Plaintiffs,

CIVIL ACTION FILE

NO. 1:24-cv-4039-TWT

v.

RADHESHVAR, LLC, d/b/a MOTEL 6,

Defendant.

MOTION TO REASSIGN RELATED CASES

Plaintiffs were sex trafficked in 2014. Two places where they were sold for sex are hotels owned by Defendant Radheshvar, LLC: a Motel 6 and Super 8. Defendant's hotels share a parking lot but are nominally separate places. So Plaintiffs sued Defendant twice: once for each hotel. Plaintiffs marked the cases as related. And shortly after their filing, these related cases were assigned to the same judge: Judge Thomas W. Thrash Jr. *See* Order, *H.M. & I.B. v. Radheshvar, LLC d/b/a Super 8*, No. 1:24-cv-4041 (Sept. 18, 2024).

Earlier this month, Judge Tiffany R. Johnson was sworn in as the newest member of the Court. (Congratulations to Judge Johnson!) As part of the case reshuffling that follows any judicial change, one of Plaintiffs' cases against Defendant (No. 1:24-cv-4041) was reassigned to Judge Johnson. The other (No. 1:24-cv-4039) remains before Judge Thrash. Of course, the cases are as factually related as ever.

Plaintiffs ask that these cases (No. 1:24-cv-4039 & 1:24-cv-4041) be assigned to the same judge. Plaintiffs, of course, have no preference about which judge is assigned. Plaintiffs have filed this motion in both Courts.

Plaintiffs contacted Defendant to find out if there was any opposition to this motion last week but never heard back.

Respectfully submitted on January 31, 2025.

ANDERSEN, TATE & CARR, P.C.

/s/ Rory A. Weeks

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CERTIFICATE OF COMPLIANCE

Under Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

ANDERSEN, TATE & CARR, P.C.

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